

EXHIBIT 12

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)

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VIDEOTAPED DEPOSITION OF DANIEL CHU

San Francisco, California

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Volume I

Reported by:

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Job No. 2583707

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1 THE WITNESS: So it's -- it's probably a --
2 a growing -- growing list of folks, but the folks
3 that we'd probably look at most are -- are Uber in
4 terms of their self-driving efforts. We also look
5 at, for instance, Tesla in terms of some of their -- 10:06:20
6 their efforts there.

7 BY MR. GONZALEZ:

8 Q Would you agree that your number one
9 competitor in the market is Uber?

10 MS. BAILY: Object to form. 10:06:28

11 THE WITNESS: I think it depends what
12 you -- [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]

16 BY MR. GONZALEZ:

17 Q All right. Let me focus on -- on your
18 words. I'll use your words.

19 [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

22 A Sorry, say again?

23 [REDACTED]
[REDACTED]
[REDACTED] 10:06:59

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 MS. BAILY: Object to form. 10:07:09

6 THE WITNESS: [REDACTED]

[REDACTED]

8 BY MR. GONZALEZ:

9 Q Would you agree that it's your number one
10 competitor in that space? 10:07:18

11 MS. BAILY: Object to form.

12 BY MR. GONZALEZ:

13 Q I'm not trying to trap you.

14 A Yeah.

15 Q If somebody else is number one, I want to 10:07:20
16 know, that's all.

17 A Yeah.

18 Q So let me go back.

19 [REDACTED]

[REDACTED] 10:07:26

21 MS. BAILY: Same objection.

22 THE WITNESS: [REDACTED]

[REDACTED]

24 BY MR. GONZALEZ:

25 Q And who would you consider to be number 10:07:33

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1 basically my user research team does the surveys.

2 BY MR. GONZALEZ:

3 Q And your research team is to have -- does
4 it have a name?

5 A They -- they basically just called it the 10:08:38
6 user research group, yeah.

7 Q User research group?

8 A Yeah.

9 Q Not Daniel's brigade or anything like that?

10 A No. 10:08:49

11 Q All right. [REDACTED]

[REDACTED]

[REDACTED]

14 A I don't remember the exact date.

15 Q Approximately. 10:08:58

16 A But approximately, we've done probably in
17 the last -- I'm trying to remember -- I mean, last
18 few months, but it's been more focused on the
19 markets that we're interested in, yeah.

20 Q And what markets are those that you were 10:09:13
21 more focused on?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 10:09:24

11 MS. BAILY: Object to form.

12 THE WITNESS: It's -- well, are you talking

13 about litigation in general or like this -- this

14 litigation in specific?

15 BY MR. GONZALEZ: 10:10:08

16 Q Litigation in general.

[REDACTED]

[REDACTED]

[REDACTED]

20 Q All right. Fair enough. Let's talk about 10:10:20

21 this litigation.

22 A Yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2 MS. BAILY: Object to form.

3 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

8 BY MR. GONZALEZ:

9 Q Do you ever have communications with public
10 agencies about your vehicles? 10:10:51

11 A Do --

12 MS. BAILY: Object to form.

13 THE WITNESS: Do I personally or --

14 BY MR. GONZALEZ:

15 Q Yes, you. 10:10:57

16 A Most of my efforts are more internal
17 focused.

18 Q Who at Waymo is the person who communicates
19 with public agencies to try to get approval for you
20 to be able to drive your autonomous vehicles there? 10:11:08

21 A It's probably going to be more of our
22 public policy team and our partnership teams.

23 Q And who are the people who are in charge of
24 those groups?

25 A So -- I'm trying to think. So Kevin Vosen, 10:11:20

1 San Francisco, if they were going to run through red
2 lights or whatnot, as -- and -- and that kind of
3 hurts other players, right. It hurts the perception
4 of the technology.

5 Q Then the next page, page 12 of the
6 PowerPoint, it says:

10:23:04

7 [REDACTED]

8 [REDACTED]

9 And there's a subheading:

10 [REDACTED]

[REDACTED]

11 [REDACTED]

12 What does that mean?

13 A What it means is if we look at the -- [REDACTED]

14 [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 And so this is referring to let's assume

24 they do that. How -- how can we make it so it's --

25 it's -- it's harder for them to do that.

10:24:02

1 of billions of dollars?

2 MS. BAILY: Object to form.

3 THE WITNESS: You're saying in general or
4 you're saying for particular like -- I just want to
5 make sure I'm answering the question correctly. 10:40:59

6 BY MR. GONZALEZ:

7 Q That's fair.

8 A Yeah.

9 [REDACTED]

10 A Okay. 10:41:04

11 Q Would you agree that the ride-sharing
12 market for autonomous vehicles is likely to be in
13 the hundreds of billions of dollars?

14 MS. BAILY: Object to form.

15 THE WITNESS: I think it's -- it's 10:41:17
16 definitely possible that in the -- in the
17 ride-sharing market alone for self-driving cars on a
18 global basis that it will be in the hundreds of
19 billions of dollars, that's correct.

20 BY MR. GONZALEZ: 10:41:33

21 Q Let me show you a document we've marked as
22 1033.

23 (Defendant Exhibit 1033 marked by the court
24 reporter.)

25 BY MR. GONZALEZ: 10:41:39

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